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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

.....X

IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

21 MC 102 (AW)

.....X

SEGUNDO LEON

**DOCKET NO.**  
**07-CV-08283-AKH**

Plaintiff,

-against-

100 CHURCH, LLC, AMBIENT GROUP, INC.,  
BANKERS TRUST COMPANY, BOROUGH OF  
MANHATTAN COMMUNITY COLLEGE, BT  
PRIVATE CLIENTS CORP., CUNNINGHAM DUCT  
CLEANING CO., DEUTSCHE BANK  
TRUST COMPANY, DEUTSHE BANK  
TRUST COMPANY AMERICAS, DEUTSCHE  
BANK TRUST CORPORATION, GPS  
ENVIRONMENTAL CONSULTANTS, INC.,  
INDOOR AIR PROFESSIONALS, INC.,  
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,  
LAW ENGINEERING, P.C., MERRILL LYNCH & CO.,  
ROYAL AND SUNALLIANCE INSURANCE GROUP,  
PLC., THE BANK OF NEW YORK TRUST COMPANY  
NA., TISHMAN INTERIORS CORPORATION, TRC  
ENGINEERS, INC., TULLY CONSTRUCTION  
CO., INC., TULLY INDUSTRIES, INC., and  
ZAR REALTY MANAGEMENT CORP., et al.

**NOTICE OF ADOPTION  
OF ANSWER TO  
MASTER COMPLAINT**

Defendants.

.....X

**PLEASE TAKE NOTICE**, that defendant CUNNINGHAM DUCT WORK  
("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its  
Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint)



Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

**WHEREFORE**, the defendant, CUNNINGHAM DUCT CLEANING CO., INC., demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York  
November 30, 2007

Respectfully submitted,  
RUSSO, KEANE & TONER, LLP

By: s/ Kevin G. Horbatiuk  
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RKT File No.: 824.078

TO: CHRISTOPHER R. LoPALO, ESQ., (CL-6466)  
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**CERTIFICATION OF SERVICE**

I hereby certify that on the 30th day of November, 2007, I electronically filed the foregoing NOTICE OF ADOPTION OF ANSWER BY DEFENDANT CUNNINGHAM DUCT CLEANING WORK with the Clerk of the Court using the CM/ECF System which sends notification of appearing parties.

RUSSO, KEANE & TONER, LLP

By: s/Kevin G. Horbatiuk

Kevin G. Horbatiuk (KGH-4977)

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